

VS.

Thresholds Psychiatric Rehabilitation Centers
FORM

FILED

[ADD: CASE HEADING]

REPORT OF PARTIES' PLANNING CONFERENCE

MAR 26 2008
3-26-2008
Judge David H. Coar
United States District Court

Pursuant to this court's order,
representing plaintiff(s), and
representing the defendant(s), met on
pursuant to Rule 26(f) to discuss:

DIANE M. DILLON PHILLIPS
BRUCE JEFFERSON
3/26/08-Met

- (1) the nature and basis of their claims and defenses;
- (2) the possibilities for a prompt settlement or resolution of this case;
- (3) to make or arrange for the disclosures required under Rule 26(a)(1); and
- (4) to develop a discovery plan.

To that end, the parties propose the following:

A. The issues in this case may be simplified by taking the following steps:

1. Complete Discovery
2. Disclosing Expert Witness
- 3.
- 4.
- 5.

B. The following modifications to the discovery requirements of the Federal Rules of Civil Procedure or Local Rules should be made in order to expedite discovery:

1. "None at this time."
- 2.
- 3.
- 4.
- 5.

Discovery will be needed on the following subjects:

1. PLAINTIFF'S EMPLOYMENT HISTORY
2. ANY AND ALL FACTS UNDERLYING THE COMPLAINT AND ANSWER.
- 3.
- 4.

D. Discovery should ~~should not~~ be conducted in phases.

"AT THIS POINT IN TIME"

E. Discovery is likely to be contentious and management of discovery should be referred to the Magistrate Judge. Yes X No

F. The parties ~~consent~~ ^{Part 6} do not consent to this matter being referred to the Magistrate Judge for final disposition.

G. The parties have discussed the possibility of alternative dispute resolution and concluded:

THE PLAINTIFF AND DEFENDANT HAVE NOT AGREED TO PARTICIPATE IN MEDIATION AT THIS TIME.

H. The parties have discussed a prompt settlement or other resolution of this matter. The plaintiff has made a written demand of \$ 4,500,000.00 and the defendant has offered \$ 0.

I. The Court should consider the following methods of expediting the resolution of this matter:

"NOTHING AT THIS TIME"

[Signature]
Attorney for Plaintiff

3/26/08

[Signature]
Attorney for Defendant